

STEVEN G. KALAR
Federal Public Defender
VARELL L. FULLER
Assistant Federal Public Defender
55 South Market Street, Suite 820
San Jose, CA 95113
Telephone: (408) 291-7753
varell_fuller@yahoo.com

~~CONFIDENTIAL~~

Counsel for Defendant CRUTCHFIELD

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR-14-00051 RMW
)	
Plaintiff,)	STIPULATION AND []
)	ORDER CONTINUING JUNE 8, 2015
vs.)	STATUS HEARING TO JULY 20, 2015,
)	FOR CHANGE OF PLEA HEARING
JUSTIN EVERETT CRUTCHFIELD and)	
DEMONTAE TEREEL TOLIVER,)	
)	
Defendants.)	

STIPULATION

Defendants Justin Crutchfield and Demontae Toliver, by and through their respective counsel, and the United States, by and through Assistant United States Attorney Amie Rooney, hereby stipulate that, with the Court's approval, the court continue status hearing set for Monday, June 8, 2015, at 9:00 a.m., to July 20, 2015, and set this matter for a change of plea hearing to be held at that time.

The reason for the requested continuance is the parties request additional time to finalize the terms of a disposition in this matter. Additionally, counsel for Mr. Toliver will be in trial on

1 June 8, 2015, the date now set for a further status hearing in this matter, and thereafter will be
2 out of the country and unavailable until July 13, 2015. The parties therefore respectfully
3 requests a continuance and exclusion of time based on the government and both defense
4 counsel's need to effectively prepare and continuity of counsel.

5 IT IS SO STIPULATED.

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7 Dated: June 3, 2015

8 _____/s/_____
9 VARELL L. FULLER
10 Assistant Federal Public Defender
11 Counsel for defendant Crutchfield

12 Dated: June 3, 2015

13 _____/s/_____
14 JAY RORTY
15 Counsel for defendant Toliver

16 Dated: June 3, 2015

17 _____/s/_____
18 AMIE D. ROONEY
19 Assistant United States Attorney

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3 **[] ORDER_____**

4 GOOD CAUSE APPEARING, upon stipulation of the parties, IT IS HEREBY
5 ORDERED that the status hearing currently set for June 8, 2015, shall be continued to July 20,
6 2015, for a change of plea hearing.

7 THE COURT FINDS that failing to exclude the time between June 8, 2015, July 20,
8 2015, would unreasonably deny counsel the reasonable time necessary for effective preparation,
9 taking into account the exercise of due diligence, and deny Mr. Toliver continuity of counsel.
10 See 18 U.S.C. § 3161(h)(7)(B)(iv) and (h)(7)(B)(iv).

11 THE COURT FURTHER FINDS that the ends of justice served by excluding the time
12 between June 8, 2015, and July 20, 2015, from computation under the Speedy Trial Act
13 outweigh the interests of the public and the defendants in a speedy trial.

14 THEREFORE, IT IS HEREBY ORDERED that the time between June 8, 2015, and July
15 20, 2015, shall be excluded from computation under the Speedy Trial Act, 18 U.S.C. §
16 3161(h)(7)(A), (B)(iv), and (h)(7)(B)(iv).

17 IT IS SO ORDERED.

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19 Dated: 6/5/15

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THE HONORABLE RONALD M. WHYTE
United States District Court Judge